

1 Susan S.Q. Kalra, CA SBN 167940
2 Email: susan@m-iplaw.com
3 MAHAMI IP LAW LLP
4 303 Twin Dolphin Drive, Suite 600
5 Redwood City, CA 94065
6 Telephone: (408) 236-6640
7 Fax: (408) 236-6641

8 William P. Ramey, III (*pro hac vice*)
9 Email: wramey@rameyfirm.com
10 RAMEY LLP
11 5020 Montrose Blvd., Suite 800
12 Houston, Texas 77006
13 Telephone: (713) 426-3923
14 Fax: (832) 900-4941

15 *Attorneys for Plaintiff*
16 CYBOENERGY, INC.

17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

15 CYBOENERGY, INC.,

Case No.: 3:21-cv-08534-SI

16 Plaintiff,

17 v.

18 NORTHERN ELECTRIC POWER
19 TECHNOLOGY, INC.,

20 Defendant.

21
22
23
24
25
26
27
28

**UNOPPOSED MOTION TO DISMISS
CLAIMS ASSERTED FOR U.S. PATENT
NO. 9,331,489**

22 CyboEnergy, Inc. (“CyboEnergy”) files this Motion to Dismiss Claims Asserted for U.S.
23 Patent 9,331,489 (the “‘489 patent”). Plaintiff has conferred with counsel for Northern Electric
24 Power Technology, Inc. (“NEP”) and they are unopposed. The claim for infringement of U.S. Patent
25 No. 8,786,133 (“the ‘133 patent”) remains (referred to as the “Patent-in-Suit”).

1 Dated: June 24, 2022

Respectfully submitted,

2 MAHAMEDI IP LAW LLP

3 /s/ Susan S.Q. Kalra

4 Susan S.Q. Kalra, CA SBN 167940
5 Email: susan@m-iplaw.com
6 303 Twin Dolphin Drive, Suite 600
Redwood City, CA 94065
Telephone: (408) 236-6640
Fax: (408) 236-6641

7
8 RAMEY LLP

9 /s/ William P. Ramey, III

10 William P. Ramey, III (*pro hac vice*)
Email: wramey@rameyfirm.com
11 5020 Montrose Blvd., Suite 800
12 Houston, Texas 77006
Telephone: (713) 426-3923
13 Fax: (832) 689-9175

14 *Attorneys for Plaintiff*

15 CYBOENERGY, INC.

16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2022, the foregoing document was filed electronically through the Court's Electronic Case Filing System. Service on this date of the public copy of this document is being made upon all counsel of record in this case by the Notice of Electronic Filing issued through the Court's Electronic Case Filing System on this date.

/s/ Susan S.Q. Kalra
Susan S.Q. Kalra